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February 22, 2018

**VIA CERTIFIED & ELECTRONIC MAIL**

Tai-Sun Schoeman, Principal  
A.P. Giannini Middle School  
3151 Ortega Street  
San Francisco, CA 94122  
schoemant@sfsusd.edu

**Re: Wyldlife Club on A.P. Giannini Middle School Campus  
U.S. Supreme Court's Ruling in *Good News Club***

Dear Principal Schoeman:

By way of introduction, the Pacific Justice Institute ("PJI") is a non-profit legal organization devoted to protecting students' and parents' rights with regard to public education. PJI has been retained to represent the student group known as Wyldlife. Kindly direct all communications relative to this matter to the undersigned.

**INTRODUCTION**

Wyldlife is a faith-based organization affiliated with the Christian youth organization Young Life. The club met weekly at A.P. Giannini Middle School ("APG") from October 5, 2017 through January 18, 2018, after which you shut down the club in violation of federal law and effectively fired one of its advisors, Joshua Whiteside, an everyday substitute teacher and soccer coach at APG. The purpose of this letter is to demand that you, as APG's principal, immediately permit Wyldlife to resume meeting on APG's campus.

**FACTS**

Sponsored by Kingston Louie, a teacher at APG, Wyldlife began meeting every Thursday in Mr. Louie's classroom starting on October 5, 2017. However, it is my understanding that you were aware of plans to launch the club well before then: Mr. Whiteside and members of Wyldlife who volunteered in his classroom throughout the 2016-17 school year openly discussed the possibility of launching Wyldlife with you and other APG administrators.

Mr. Louie, Mr. Whiteside, and others involved with Wyldlife made no effort to hide the club's existence from you. The club was well received by APG's students: Approximately 30-40 attended Wyldlife's weekly meetings. It is my understanding that you frequently stopped by Mr. Louie's classroom to ask how things were going as

students gathered outside, waiting for club meetings to begin. It is also my understanding that in December 2017, Mr. Louie and Mr. Whiteside extended you an open invitation to stop by Wyldlife's meetings, and that you said you would stop by to visit at some point.

On December 8, 2017, you asked Mr. Whiteside for more information about Wyldlife – its purpose, what goes on during meetings, and what kind of insurance coverage or policies the club had. Mr. Whiteside answered all of your questions as best he could and promised to give you additional information from Young Life, which he promptly did via e-mail on December 11, 2017. A copy of that e-mail is attached hereto as **Exhibit "A."** Mr. Whiteside's e-mail included all Wyldlife publications and fliers he had shared with students and their parents. Mr. Whiteside also informed you in that e-mail that Wyldlife's leaders were not leading talks or discussions concerning the Christian faith, but simply offering a safe space to eat lunch, play games, build friendships, and receive tutoring and mentorship from caring adults.

The following day, December 12, 2017, you met informally with Mr. Louie and Mr. Whiteside in APG's hallway concerning Wyldlife's religious (specifically Christian) focus and your concerns about "separation of church and state." Mr. Louie and Mr. Whiteside told you at that time that they would make clear to students and their parents that all activities offered through Wyldlife were not endorsed by APG, but conducted and insured exclusively through Young Life. By all indications, your concerns appeared to be assuaged: When Mr. Louie asked if the club could continue meeting, you informed him that it could. Mr. Whiteside can testify to this.

After that hallway meeting, Wyldlife continued to meet until January 18, 2018. Despite your acceptance of Mr. Louie and Mr. Whiteside's invitation to stop by, it is my understanding that you never did.

Wyldlife's existence at APG came to an abrupt halt on January 23, 2018: That day, you called Mr. Whiteside out of his last-period class and into a meeting with you and Assistant Principal Gloria Minjares. At this meeting, you informed Mr. Whiteside that a parent had complained about Wyldlife's existence on campus and that the American Civil Liberties Union ("ACLU") – an organization known to attack any apparent state endorsement of religion, even where no such endorsement has occurred – had contacted you as well. You informed Mr. Whiteside that he had been accused of proselytizing to, and otherwise interacting inappropriately with, students at APG, both as a substitute teacher and as an assistant coach with APG's boys' and girls' soccer teams. As I understand, you also falsely accused Mr. Whiteside of insubordination with regard to Wyldlife: When he respectfully reminded you that you had permitted Wyldlife to continue meeting at APG, you sternly replied, "I told you to stop meeting." This assertion is included in an e-mail dated January 23, 2018 memorializing your meeting with Mr. Whiteside, a copy of which is attached hereto as **Exhibit "B."** Although Mr. Whiteside denied – and continues to deny – the accusations leveled against him, you barred him from continuing to work at APG in any capacity. Wyldlife has not met at APG since then.

#### **LEGAL DISCUSSION**

In 2001, the U.S. Supreme Court decided the case of *Good News Club v. Milford Central School*. 533 U.S. 98 (2001). In that case, the Supreme Court upheld the right of a private Christian organization to hold meetings on a public elementary school's grounds when school was not in session: The Supreme Court held not only that permitting the

organization to use the school's facilities did not violate the Establishment Clause of the U.S. Constitution's First Amendment, but that the school district that tried to prohibit the club from meeting did violate the Establishment Clause by doing so. *Good News Club*, 533 U.S. at 119-20. The Establishment Clause, as applied to the states via the Fourteenth Amendment, requires that government agencies, including public schools, be neutral, not hostile, toward religion and religious organizations: "[T]he guarantee of neutrality is respected, not offended, when the government, following neutral criteria and evenhanded policies, extends benefits to recipients whose ideologies and viewpoints, including religious ones, are broad and diverse." *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 839 (1995) (emphasis added).

Furthermore, as you should be aware, "First Amendment rights, applied in light of the special characteristics of the school environment, are available to teachers and students." *Tinker v. Des Moines Indep. Community Sch. Dist.*, 393 U.S. 503, 506 (1969). "It can hardly be argued that either students or teachers shed their constitutional rights to freedom of speech or expression" – or other First Amendment rights, for that matter, including the freedoms of religion and assembly – "at the schoolhouse gate." *Id.*

Attached hereto as **Exhibit "C"** is a list of clubs offered on campus at APG. Such clubs include Conneqt, an organization for LGBT+ students; Slaygirls, an organization aimed at female empowerment; Girls Group, whose focus is on friendship and team building; and Plato's Cave/The Philosophers' Club, which discusses values, knowledge, reality, and critical thinking. These clubs all meet during lunchtime, as Wyldlife did. In allowing these clubs and others (collectively the "Secular Clubs") to meet on campus, APG has created a limited public forum – i.e., a forum limited to certain groups or dedicated solely to the discussion of certain subjects. *Pleasant Grove City v. Summum*, 129 S. Ct. 1125, 1132 (2009) [citing *Perry Educ. Assn. v. Perry Local Educators' Assn.*, 460 U.S. 37, 46 n. 3 (1983)]. In such a forum, any restrictions imposed must be viewpoint-neutral. *Id.* [citing *Good News Club*, 533 U.S. at 106-07]. When a public school excludes from a limited public forum speech discussing otherwise permissible subjects on the ground that the speech discusses the subject from a religious viewpoint, the school has engaged in viewpoint discrimination and thus violated the speaker's First Amendment rights. *Good News Club*, 533 U.S. at 111-12 [citing *Rosenberger*, 515 U.S. 819, and *Lamb's Chapel v. Center Moriches Union Free Sch. Dist.*, 508 U.S. 384 (1993)].

In this case, APG is a public elementary school serving grades 6-8.<sup>1</sup> As stated above, in allowing the Secular Clubs to meet on campus, whether during lunchtime or after the school day ends, APG has created a limited public forum. Several of the Secular Clubs mentioned above perform many of the functions that Wyldlife did: Like Girls Group, Wyldlife aimed to provide a place where students could build friendships; like the Philosophers' Club, Wyldlife enabled students to discuss values and think critically. No religious proselytizing occurred at Wyldlife's meetings, nor were there any talks

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<sup>1</sup> California law divides public schools, for the most part, into two classifications: elementary and secondary. Educ. Code § 50. Secondary schools include four-year high schools, technical schools, adult schools, and junior high schools. Educ. Code §§ 52-53; see also *Meyer v. Bd. of Trustees* (1961) 195 Cal. App. 2d 420, 425 [stating that "junior high schools are part of the secondary schools of the state, to be maintained by high school districts"] and Educ. Code § 37060 [permitting high school districts to establish junior high schools]. Because APG includes sixth graders in addition to seventh and eighth graders and was established as part of a unified school district as opposed to a high school district, APG is treated herein as an elementary school.

discussing the Christian faith. Wyldlife simply provided one more place where students could meet, play games (as the 6<sup>th</sup> Grade Game Day, Chess Club, and Beacon Sports teams do), and receive mentoring and tutoring from caring adults (as students in Connect and the female-oriented clubs presumably do). You, as APG's principal, shut down Wyldlife solely due to its religious viewpoint. In doing so, you have violated Wyldlife's right to meet and placed both APG and the San Francisco Unified School District ("SFUSD") in a very actionable position.

To be fair, your actions, to some degree, are understandable: As the Supreme Court noted in *Good News Club*, "a state interest in avoiding an Establishment Clause violation 'may be characterized as compelling,' and therefore may justify content-based discrimination." *Good News Club*, 533 U.S. at 112-13 [quoting *Widmar v. Vincent*, 454 U.S. 263, 271 (1981)]. However, the Supreme Court also found unpersuasive the defense raised by the school district in *Good News Club* that "children will perceive that the school is endorsing the Club and will feel coercive pressure to participate, because the Club's activities take place on school grounds." *Id.* at 113-14. The same is true here: Although Wyldlife publicized its meetings, as other clubs at APG do, no one was coerced or pressured to attend Wyldlife's meetings. In fact, Wyldlife took steps to notify parents of its existence on campus through fliers and social media, and it was on the parents themselves to determine whether their children could participate in Wyldlife's activities. *Good News Club*, 533 U.S. at 115. Regardless, the Supreme Court has "never extended our Establishment Clause jurisprudence to foreclose private religious conduct during nonschool hours merely because it takes place on school premises where elementary school children may be present." *Id.* Although Wyldlife did meet during school hours, it met during non-instructional time, did not cause any disturbance or disruption on campus, and did not interfere with anyone else's rights, which makes your decision to shut down Wyldlife all the more egregious: "When [a student] is in the cafeteria, or on the playing field, or on the campus during the authorized hours, he may express his opinions, even on controversial subjects ... if he does so without 'materially and substantially interfer[ing] with the requirements of appropriate discipline in the operation of the school' and without colliding with the rights of others." *Tinker*, 503 U.S. at 512-13 [quoting *Burnside v. Byars*, 363 F.2d 744, 749 (5<sup>th</sup> Cir. 1966)].

Furthermore, California's Civic Center Act ("the Act") states that "[t]here is a civic center at each and every public school facility and grounds within the state." Cal. Educ. Code § 38131(a). The Act provides that citizens, clubs, and associations formed for moral activities may "engage in supervised recreational activities" on public school campuses and "meet and discuss" every subject relating to "the educational, political, economic, artistic, and moral interests of the citizens of the communities in which they reside." *Id.* Such clubs and associations include religious clubs, which "can be characterized properly as ... teaching ... morals and character development from a particular viewpoint." *Good News Club*, 533 U.S. at 111. The Supreme Court held in *Good News Club* that "we can see no logical difference in kind between the invocation of Christianity by the Club and the invocation of teamwork, loyalty, or patriotism by other associations to provide a foundation for their lessons." *Id.* To shut down Wyldlife based on its religious aspect, then, constitutes viewpoint discrimination, which is "an egregious form of content discrimination. The government must abstain from regulating speech when the specific motivating ideology or the opinion or perspective of the speaker is the rationale for the restriction." *Rosenberger*, 515 U.S. at 829 (emphasis added).

Bottom line: To treat Wyldlife differently from other clubs due to its religious aspect is discriminatory and violates both federal and state law.

#### **CONCLUSION**

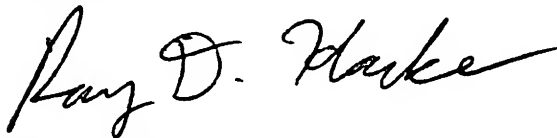
As stated above, it is my understanding that you shut down Wyldlife after being contacted by the ACLU. You should be more concerned about PJI's involvement in this matter: PJI specializes in cases involving the First Amendment rights of religious liberty and free speech and has won a number of cases in those areas, including some involving public schools.

Regardless, PJI wishes to resolve this matter amicably without resorting to stressful, costly, time-consuming litigation. PJI therefore demands that you do the following:

1. Allow Wyldlife to resume meeting at APG, effective immediately;
2. Permit Mr. Whiteside to begin teaching, coaching, and working with Wyldlife's members at APG again, effective immediately; and
3. Restore to Mr. Whiteside any and all back pay owed for any days he was pre-scheduled to work, but could not work, after you barred him from working at APG. The amount of pay should cover all school days from January 24, 2018, through the final school day before Mr. Whiteside resumes working at APG. This includes any pay Mr. Whiteside would otherwise have received for substitute teaching as well as coaching soccer.

Kindly inform the undersigned by March 2, 2018 as to whether you will immediately grant or continue to deny Wyldlife official status as a student organization on equal terms with other clubs at APG and allow Wyldlife to resume meeting. Thank you for your consideration in this matter and your service to the community.

Very truly yours,



Ray D. Hacke  
Staff Attorney  
Pacific Justice Institute

CC: Dr. Vincent Matthews  
Superintendent  
San Francisco Unified School District  
555 Franklin Street  
San Francisco, CA 94102

# **EXHIBIT “A”**



Whiteside, Joshua &lt;whitesidej@sfusd.edu&gt;

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**Wyldlife Club at A.P. Giannini**

Jan 18, 2018

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**Whiteside, Joshua** <whitesidej@sfusd.edu>  
To: Tai-Sun Schoeman <schoemant@sfusd.edu>

Mon, Dec 11, 2017 at 9:24 PM

Mr. Tai-Sun Schoeman,

Thank you for giving me the opportunity to share with you and clarify our Thursday lunch club. The lunch club is led by myself and volunteers that have gone through a SFUSD approved background check. This lunch club has proven successful and appreciated by the 30-40 students who have attended each week.

Young Life / Wyldlife is a faith-based Christian organization. However, when we are present on campus we are not publicly sharing our faith nor are we leading talks or discussions concerning the Christian or any other religious views. During the Thursday lunch club, our aim is to simply give students a safe place to belong and to provide them a time and space to build friendship through a shared meal, games and making ourselves as adult leaders available for academic mentorship and tutoring.

Since Wyldlife is not affiliated with the school district any Wyldlife trips or activities outside of the lunch club are solely sponsored and insured by Younglife. When these events are promoted it will be made clear that they are Young Life sponsored, not school endorsed

Below I have attached:

- 1) A parental letter
- 2) The certificate of insurance for Young Life showing all our insurance coverages.
- 3) A Club Description
- 4) Feel free to refer to the website [www.younglife.org](http://www.younglife.org)

I apologize for not sharing this information with you earlier. I look forward to our continued conversation and how to best serve our student body.

Sincerely,  
Joshua Whiteside

**Club Description:**

Wyldlife is the middle school branch of "Young Life," an international faith-based non-profit organization that exists to enrich the lives of youth through friendships and interactions with caring adults within a positive atmosphere of mentorship.

The lunch club is led by myself and volunteers that have gone through a SFUSD approved background check. Wyldlife is not affiliated with the school district. Any Wyldlife trips or activities outside of the lunch club are not associated with the school. These trips are sponsored and insured by Young Life. When these events are promoted it will be made clear that they are Young Life sponsored, not school endorsed.

You may be asking if a decision of faith is required for participation. The answer is a firm and clear "No." Wyldlife is openly welcome for students of all orientations and beliefs, or the lack thereof, to participate and freely enjoy without pressure or discrimination. Wyldlife activities conducted directly on school campus adhere solely to promote a fun and safe community atmosphere for students to belong and to provide a space for the building of friendships. While on campus no proclamations of faith are given while gathered together with students.

You may also find out more about Young Life by visiting the following web link: [www.younglife.org](http://www.younglife.org)

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**2 attachments**



**CA490 COI.pdf**  
81K



**Wyldlife Parent Letter Fall 2017.pdf**  
164K

# **EXHIBIT “B”**



**SFUSD**

Whiteside, Joshua <whitesidej@sfusd.edu>

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## Memorialization

Message

**Schoeman, Tai-Sun** <schoemant@sfusd.edu>

Tue, Jan 23, 2018 at 3:47 PM

To: Joshua Whiteside <whitesidej@sfusd.edu>, Gloria Minjares <minjaresg@sfusd.edu>, RichardGregory John <johnr@sfusd.edu>

Hello Mr. Whiteside,

Thank you for meeting with Ms. Minjares and me today to discuss the following:

It was reported to me this morning that you went against my directives and continued to promote a religious based club to A.P.G students, within the context of the school day and as an assistant soccer coach.

- Therefore, I am blocking you from taking substitute positions effective immediately
- You will not be considered nor will I authorize for you to hold any coaching position at A.P.G.

Respectfully,

Tai-Sun Schoeman  
Principal  
A.P. Giannini M.S., SFUSD  
San Francisco, CA. 94122  
415-759-2770  
> Fax-415-664-8541  
> schoemant@sfusd.edu

# **EXHIBIT “C”**

2017 - 2018  
APG CLUB LIST

<b><u>CLUB:</u></b>	<b><u>STAFF:</u></b>	<b><u>Day(S):</u></b>	<b><u>Time:</u></b>	<b><u>Where:</u></b>	<b><u>GROUP FOCUS:</u></b>
Let's Get Movin' and Kinecting!	MS. Liana & MS. Kim	1st and 3rd wed	9:00-9:45am	cafeteria	Open to all, XBOX Kinect Sports, Zumba, Dance Central, or Dance Dance Revolution
6TH Grade Game Day	Mr. Fernandez	Tues SEPT THRU DEC	LUNCH	Garden, Square Benches	Open to all 6TH Graders. Board Games.
6TH Grade Game Day	Mr. Fernandez	THURS SEPT THRU DEC	LUNCH	Wellness Center, 221	Open to all 6TH Graders. XBOX Kinect Sports, Zumba, & Dance
GIRLS GROUP	MS. GEBB and MS. Geri	2nd wed	LUNCH	Room 100	FRIENDSHIP, Team BUILDING
HANDBELLS	MS. LINDL	Mon, THU, Fri	8:35-9:05 or 3:20-4:10	CHOIR room	Open to all 7TH and 8TH Graders in CHOIR

Cheerleading	Mrs. Lykins	Tues & Thurs	3:40-4:15	PE Hallway	Open to all APG students Tryouts 9/5 & 9/7
Musical	Ms. Sunderland and Ms. Lindl	Daily from Jan-Feb	3:35-5:00	auditorium	Auditions are open to all students. Go to <a href="http://www.apgchoir.com">www.apgchoir.com</a> for more information
Plato's cave - The Philosopher's Club	Mr. Johnsen	2nd & 4th Wed	Lunch	Room 405	Open to all. We will examine, discuss, and debate topics that include: -values -knowledge -reality -critical thinking
Poetry Club	Ms. Castro	Thurs	Lunch	Room 206	Reading and writing poetry. No experience necessary!
Study Center	Beacon	M-Th	Lunch	Room 230	Quiet study place and help w/homework!

Beacon SPORTS	Beacon JUSTICE H	Tues THURS	LUNCH	yard/gym	Intramural SPORTS/Team- BUILDING
conneQT	Beacon CHRIS EAH	MONS WEDS	LUNCH	ROOM 214	safe, affirming, educational, empowerment FOR LGBTQIA + INDIVIDUALS and allies
SLAYGIRLS	Beacon RACHELLE	Tues THURS	LUNCH	230/TBA	GIRLS empowerment/ RECOGNIZING THE SLAYNESS IN EACH OTHER
CHESS CLUB	Mr. Ferraris	FRI	LUNCH	ROOM 403	CHESS BOARDS BOTH DIGITAL and analog. ALL are welcome TO JOIN! come Learn to PLAY or CHALLENGE YOURSELF AGAINST APG'S BEST. we WILL Have TWO Tournaments THIS year WITH BIG PRIZES.

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**Re: COMMUNICATION WITH A REPRESENTED PARTY**

1 message

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**Ray Hacke** <rhacke@pji.org>  
To: Mike Quinn <quinnm@sfusd.edu>

Tue, Mar 13, 2018 at 5:18 PM

Mike,

The authority I have is *Good News Club v. Milford Central School*, 533 U.S. 98 (2001). The original letter I sent to Mr. Schoeman, which you now have (and supposedly gave a cursory scan), spells that out. In that case, the Supreme Court upheld the right of a private Christian organization to hold meetings on a public elementary school's grounds when school was not in session: The Supreme Court held not only that permitting the organization to use the school's facilities did not violate the Establishment Clause of the U.S. Constitution's First Amendment, but that the school district that tried to prohibit the club from meeting ***did*** violate the Establishment Clause by doing so. *Good News Club*, 533 U.S. at 119-20. The Establishment Clause, as applied to the states via the Fourteenth Amendment, requires that government agencies, including public schools, be neutral, not hostile, toward religion and religious organizations: "[T]he guarantee of neutrality is respected, not offended, when the government, following neutral criteria and evenhanded policies, extends benefits to recipients whose ideologies and viewpoints, ***including religious ones***, are broad and diverse." *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 839 (1995) (emphasis added).

Now, you might argue that *Good News* is distinguishable from this case because it involved an after-school program, not one that meets during the school's lunch hour. Such an argument is invalid: In allowing other clubs -- LGBT organizations, female empowerment clubs, a "Philosophers' Club," etc. -- the school has created a limited public forum -- i.e., a forum limited to certain groups or dedicated solely to the discussion of certain subjects. *Pleasant Grove City v. Summum*, 129 S. Ct. 1125, 1132 (2009) [citing *Perry Educ. Assn. v. Perry Local Educators' Assn.*, 460 U.S. 37, 46 n. 3 (1983)]. In such a forum, any restrictions imposed must be viewpoint-neutral. *Id.* [citing *Good News Club*, 533 U.S. at 106-07]. When a public school excludes from a limited public forum speech discussing otherwise permissible subjects on the ground that the speech discusses the subject from a religious viewpoint, the school has engaged in viewpoint discrimination and thus violated the speaker's First Amendment rights. *Good News Club*, 533 U.S. at 111-12 [citing *Rosenberger*, 515 U.S. 819, and *Lamb's Chapel v. Center Moriches Union Free Sch. Dist.*, 508 U.S. 384 (1993)].

In other words, based on the foregoing (and contrary to your assertion in your previous e-mail), a public school district IS legally required to host an adult-led religious group on campus. Furthermore, by shutting down Wyldlife, Mr. Schoeman has put A.P.

Giannini Middle School and the San Francisco Unified School District in a very actionable position. I say this not to be threatening, but merely as a statement of fact. SFUSD cannot possibly think that it is free to disregard a Supreme Court ruling declaring that religious groups have a right to meet on public school campuses, or that it will face no repercussions for doing so. Ergo, I strongly recommend that SFUSD allow Wyldlife to resume meeting at APG, effective immediately.

On Tue, Mar 13, 2018 at 4:51 PM, Mike Quinn <quinnm@sfusd.edu> wrote:



Mr. Hacke,

I would be glad to hear you out regarding your concerns. I don't think threats or deadlines are particularly conducive to productive discussions. From my quick scan of your earlier correspondence, I must say that I don't think that a public school district is legally required to host an adult-led religious group on campus, and I can't imagine you do either. But I'd be glad to consider any authority you might have on that point.

Mike Quinn

William Michael Quinn, Jr.

Senior Deputy General Counsel

San Francisco Unified School District

555 Franklin Street, Third Floor

San Francisco, CA 94102

(415) 241-6054 (Telephone)

(415) 241-6371 (Facsimile)

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**From:** Ray Hacke [mailto:rhacke@pji.org]  
**Sent:** Tuesday, March 13, 2018 4:46 PM  
**To:** Mike Quinn <quinnm@sfusd.edu>  
**Subject:** Re: COMMUNICATION WITH A REPRESENTED PARTY

Mr. Quinn,

Thank you for contacting me. I contacted Mr. Schoeman and Dr. Matthews because I did not know who else to contact. I will deal with you directly on all matters related to this case from this point forward.

I presume that Mr. Schoeman and/or Dr. Matthews have forwarded the letters I have sent via both e-mail and regular mail to you. In case they haven't, I have attached copies of both letters hereto.

I gave Mr. Schoeman until the close of business today (March 13) to inform me whether or not he will allow Wyldlife to resume meeting on the A.P. Giannini Middle School campus. As you are counsel for SFUSD, and as it is apparent that I will now be dealing with you and not Mr. Schoeman, I now pose this question to you. As a courtesy to you, I will extend the deadline to 5 p.m. tomorrow (March 14).

PJI is eager to resolve this matter amicably and informally, without resorting to litigation. However, please be advised that PJI will pursue litigation to resolve this matter if necessary.

Sincerely,

Ray D. Hacke

Staff Attorney

Pacific Justice Institute

On Mon, Mar 12, 2018 at 5:10 PM, Mike Quinn <quinnm@sfusd.edu> wrote:



Mr. Hacke,

It has come to my attention that you have been communicating directly with Mr. Tai Schoeman, Principal of the District's A. P. Giannini Middle School. As I am sure you realize, the District and its employees are represented in this matter. I am writing to respectfully insist that you cease and desist immediately from any further communication with these represented parties.

Mike Quinn

William Michael Quinn, Jr.

Senior Deputy General Counsel

San Francisco Unified School District

555 Franklin Street, Third Floor

San Francisco, CA 94102

(415) 241-6054 (Telephone)

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Ray D. Hacke

Staff Attorney

Pacific Justice Institute

1250 Aviation Ave.

Suite 260

San Jose, CA 95110

Phone: (916) 857-6900

Fax: (916) 857-6902

"If the foundations are destroyed, what can the righteous do?" -- Psalm 11:3

--

Ray D. Hacke

Staff Attorney

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San Jose, CA 95110

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"If the foundations are destroyed, what can the righteous do?" -- Psalm 11:3